

Idaho Completion Project

Bechtel BWXT Idaho, LLC

February 16, 2004

CCN 47875

Mr. Frank C. Holmes, Director
INTEC Program Division
U.S. Department of Energy
Idaho Operations Office (NE-ID)
1955 Fremont Avenue
Idaho Falls, ID 83401-1154

CONTRACT NO. DE-AC07-99ID13727 – APPROVAL NEEDED OF CERCLA TIME CRITICAL REMOVAL ACTION FOR D&D OF BUILDING CPP-627

Dear Mr. Holmes:

The U.S. Department of Energy, Idaho Operations Office (NE-ID) and Bechtel BWXT Idaho, LLC (BBWI) has agreed to D&D building CPP-627 by January 31, 2005 under the challenge scope of work. Given this aggressive schedule, the minimum six-month planning period for a non-time critical removal action is not available.

This letter requests NE-ID approval to undertake D&D of Building CPP-627 under DOE's independent authority delegated by Presidential Executive Order 12580 (1987), to perform removal actions upon the INEEL site. This proposed time critical removal action is lawful and appropriate as applied to the factual circumstances of CPP-627. It is consistent with the National Oil and Hazardous Substances Pollution Contingency Plan policy to take action as soon as possible to prevent or mitigate a threat of release of hazardous substances. Attached is a white paper that provides more details on the removal action process, DOE's authority to conduct D&D activities as time critical removal actions, and the threat of release that exists at CPP-627.

Written direction to proceed with a time critical removal action is requested from NE-ID by February 23, 2004. This approval facilitates BBWI's ability to achieve this aggressive schedule. If you have any questions, please contact Mr. Martin Doornbos at 526-0676.

Sincerely,



J. H. Valentine, Deputy Project Director
Clean/Close INTEC Project
Idaho Completion Project

LSC:srs

Attachment

cc: W. L. Bauer, NE-ID, MS 1221
J. R. Cooper, NE-ID, MS 1154
S.S. Crawford, INEEL, MS 3810

K. E. Hain, NE-ID, MS 1222
R. C. Hall, NE-ID, MS 1222
S. G. Stiger, INEEL, MS 3204

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bcc: (w/o Enc.)
L. S. Cahn, MS 3419
M. R. Cole, MS 3419
M. H. Doornbos, MS 3419
M. J. Graham, MS 3940
D. P. Hutchinson, MS 3211
D. J. Kuhns, MS 3419
R. L. Loos, MS 3404
K. Mcneel, MS 3211
P. J. Smith, MS 3419
R. T. Swenson, MS 3211
L. C. Tuott, MS 3419
SP6 D&D Project Files
ARDC Files, MS 3940
J. H. Valentine Letter File (JHV-019-04) *ekc*
Correspondence Control, MS 3106

Uniform File Code: 6102

Disposition Authority: ENV1-h-1

Retention Schedule: Cut off at submission of the final financial status report for the site, or after resolution of all issues, whichever is later. Destroy 10 years after cutoff with written approval from the EPA award official.

NOTE: Original disposition authority, retention schedule, and Uniform Filing Code applied by the sender may not be appropriate for all recipients. Make adjustments as needed.